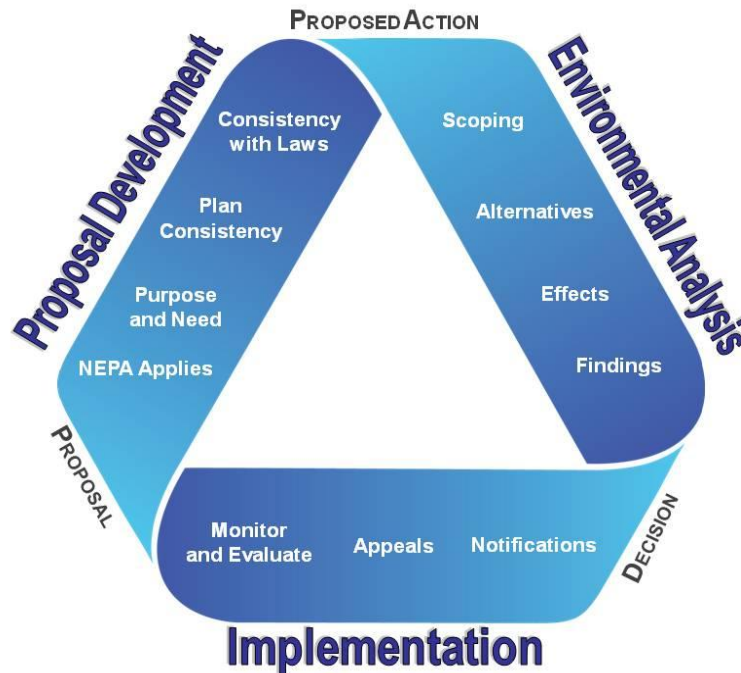


Project Initiation Letter (PIL) Format/Template Discussion:

The words “project initiation” seem to imply that the PIL is the starting point for a project. However, it is only the beginning of the NEPA portion of any project. All projects should in fact originate from extensive pre-work on the “left-hand side” of the NEPA triangle to assure numerous aspects of the project are thoroughly understood. These aspects include the purpose and need, dimensions, timing, scope, location, complexity, and tentative significance of the project.



A thorough left-hand side analysis will produce the following information: 1) area location, 2) existing condition description, 3) desired condition description, 4) comparison of existing and desired to determine a need for filling the gap, 5) list of possible ways to fill that gap, and 6) a developed proposed action. Depending on the scale, these assessments may be narrowly focused and very brief, or very broad. Broad-scale assessments, such as an Ecosystem Assessment at the Watershed Scale or other suitable means, could be used to complete the left-hand side assessment. **Collaboration** with interested parties also aids in determining the aspects of a project for left-hand side analysis.

“NEW” KNF Forest Plan (a.k.a. “Land and Resource Management Plan for the Kaibab National Forest,” February 2014)

Forest Plan Components (FP. pp. 5-6):

Plan components (decisions) include: **goals/desired conditions**, **objectives**, **standards**, **guidelines**, **suitability of uses**, **management areas** (including designated areas), and **monitoring**. They were developed collaboratively with input from a variety of external and internal stakeholders with broad interdisciplinary representation. Plan components do not reiterate existing law, regulation, or policy. An interdisciplinary team refined the final form and organization of the plan to make it as understandable, useable, and integrated as possible.

Desired Conditions (Goals) describe the aspirational picture for the Kaibab NF. **Goals**, as required by the 1982 Planning Rule provisions, **are articulated as “desired conditions”** in this plan. They are the ecological and socioeconomic attributes toward which management of the land and resources of the plan area are directed. They are not commitments or final decisions approving projects or activities; rather, they guide the development of projects and activities. They have been written to contain enough specificity to allow for determining progress toward their achievement. Projects are designed to maintain or move toward desired conditions and to be consistent with the plan over the long term. In some cases, goals/desired conditions may only be achievable over hundreds of years.

(Example; Silviculture modeling for 5, 10, 20, 40, and 50 year growth and density on vegetation management projects; the forest is a sustainable resource and has to be evaluated for both the project timeframe and into the future).

Objectives describe how the Kaibab NF intends to move toward the desired conditions. Objectives are concise projections of measurable, time specific intended outcomes. Objectives have been established for the work considered most important to address the needs for change and achieve desired conditions. They also provide metrics for evaluating accomplishments.

Guidelines are technical design criteria or constraints on project and activity decision making that help to make progress toward desired conditions. A guideline allows for departure from its terms, so long as the intent of the guideline is met. Deviation from a guideline must be specified in the decision document with the supporting rationale. When deviation from a guideline does not meet the original intent, a plan amendment is required.

Standards are technical design constraints that must be followed when an action is being taken to make progress toward desired conditions. Standards differ from guidelines in that standards do not allow for any deviation without a plan amendment.

Management Areas are delineated areas with a common set of plan components that differ from the general Forest. Management Areas are established to meet specific management needs.

Designated Areas are a special type of management area that are established by Congress or other administrative processes of the Federal executive branch because of unique or special characteristics. Examples of statutorily designated areas are national heritage areas, national

recreation areas, national scenic trails, wild and scenic rivers, wilderness areas, and wilderness study areas. Examples of administratively designated areas are experimental forests, research natural areas, scenic byways, botanical areas, and significant caves.

Suitability of National Forest System (NFS) lands **are identified as “suitable” for various uses**. An area may be identified as **suitable or not suitable** for certain uses, depending on its compatibility with desired conditions and objectives for the area. This plan addresses suitability for timber, grazing, recreation, minerals, and energy resource activities.

Monitoring is the part of the adaptive management strategy used to determine the degree to which on-the-ground management is maintaining or making progress toward desired conditions. The monitoring plan includes questions and performance measures designed to evaluate implementation and effectiveness, and inform adaptive management.

New Forest Plan Concepts (FP. pp. 6-8):

All lands is the concept that ecosystems transcend land ownership boundaries, thus, effective land and resource management requires cooperation and collaboration among the Forest Service, other land managing agencies, tribes, and private landowners. This plan was developed using an approach whereby plan components were developed considering the greater landscape and the Kaibab NF’s ecological, social, and economic role.

Sustainability is meeting the needs of the present generation without compromising the ability of future generations to meet their needs. Sustainability is composed of desirable social, economic, and ecological conditions or trends interacting at varying spatial and temporal scales, embodying the principles of multiple use and sustained yield (FSM 2020.5).

Resilience is the capacity of a system to absorb disturbance and reorganize while undergoing change so as to still retain essentially the same function, structure, identity, and feedback (FSM 2020.5).

Scale: Desired conditions are described at multiple scales where appropriate. **Descriptions at various scales are sometimes necessary to provide adequate detail and guidance for the design of future projects and activities that will help achieve the desired conditions over time**. The three scales used in this plan are: fine scale, mid-scale, and landscape scale.

- ✓ **Fine scale** is an area 10 acres or less in size. In forested ecosystems, it is a scale at which the distribution of individual trees (single, grouped, or aggregates of groups) is described. Fine-scale desired conditions provide the view that can be observed standing in one location on the ground. Fine-scale desired conditions typically contain greater variability, which is desirable for providing heterogeneity at smaller spatial scales.
- ✓ **Mid-scale** desired conditions are composed of assemblages of fine-scale units and have descriptions that would be averaged across areas of 100 to 1,000 acre units.
- ✓ **Landscape scale** is an assemblage of 10 or more mid-scale units, typically totaling more than 10,000 acres, composed of variable elevations, slopes, aspects, soils, plant associations, and disturbance processes. Landscape scale desired conditions provide the big picture overview with resolution that would, for example, be observable from an airplane or from a zoomed out Google Earth view. The landscape scale is also an appropriate scale for describing less common components that would not necessarily occur on every mid-scale unit within the landscape.

Potential natural vegetation is the vegetation that would occur in the presence of natural disturbance processes such as frequent fire return intervals. In some areas, there is a difference between the existing vegetation type and the potential vegetation type, such as where historic grasslands are currently encroached by trees. The **potential natural vegetation**, not the existing vegetation, determines which desired conditions apply.

Vegetation structure includes both the vertical and horizontal dimensions. Horizontal structure may refer to patterns of trees or groups of trees and openings, as well as tree size and tree density. Vertical structure may refer to the layers, appearance, and composition of vegetation between the ground and the top of the tallest vegetation and may include grasses, forbs, shrubs, and trees.

Natural variability references past conditions and processes that provide important context and guidance relevant to the environments and habitats in which native species evolved. Disturbance driven **spatial and temporal variability** is vital to ecological systems. Biologically appropriate disturbances provide for heterogeneous conditions and subsequent diversity. Conversely, “uncharacteristic disturbance” such as high-intensity fire in plant communities that historically had a frequent low intensity fire regime can have the effect of reducing diversity, increasing homogeneity, and resulting in states that may be permanently altered.

Ranges of values presented in **desired conditions** reflect either natural or desired variation in the composition and structure within a community or resource area. **Desired conditions** may or may not be the same as historic conditions and may have wide ranges due to spatial variability in soils, elevation, aspect, or social values. Where desired conditions specify a range of values, the full spectrum of values within that range is desirable, although the desirable distribution of values within that range may vary depending on the resource. It may also be desirable to manage for desired conditions at the upper or lower end of a range in a particular area, such as lower vegetation density in the wildland-urban interface (WUI) to achieve the desired fire behavior within proximity of private property and human occupancy. Higher densities may be desired in other areas to meet habitat requirements for specific species.

Integration recognizes and identifies key relationships between various plan resources and activities. Plan components are integrated to address a variety of ecological and human needs. For example, **desired conditions for ponderosa pine** incorporate habitat needs for a variety of species, as well as the scenic components that recreationists desire. Interrelationships between parts of the plan are identified with crosswalks to show their systematic nature. In electronic versions of the plan, these crosswalks are hyperlinked (indicated by italicized text) to allow users to be easily redirected to the other relevant sections of the plan.

Adaptive management is a system of management practices based on clearly identified intended outcomes and monitoring to determine if management actions are meeting those outcomes. If needed, it facilitates management changes that will best ensure that those outcomes are met or re-evaluated. Adaptive management stems from the recognition that knowledge about natural resource systems is sometimes uncertain (36 CFR 220.3), particularly for dynamic issues such as climate change, invasive species, and disturbances that are not easily predicted.

Climate change is addressed throughout this plan, indirectly through desired conditions in the form of functional ecosystems and resilient landscapes, and directly in management approaches and the monitoring plan where appropriate. Appendix D to the new Forest Plan provides a more detailed explanation of the strategy the Kaibab NF is using to address climate change.

Excerpts from: Forest Service Handbook (FSH) 1909.15 – National Environmental Policy Act Handbook; Chapter 10 – Environmental Analysis (06/25/2012)

11.2 - Proposed Action, Purpose and Need, and Decision Framework

A proposed action is a proposal by the Forest Service to authorize, recommend, or implement an action to meet a specific purpose and need. All proposed actions have five parts that comprise their whole: who, what, how, where, and when.

WHO is proposing the action?

WHAT is the action being proposed?

HOW will the action be accomplished?

WHERE is the action being proposed?

WHEN is the action being proposed?

The “who” is the Forest Service, even in the case of external projects. When the Forest Service accepts an external proponent’s proposal (like a powerline or ski resort) it becomes an Agency proposal to authorize the action. The “who” may also be the title of the responsible official, such as “The North Kaibab Ranger District proposes to...”

The “what” refers to the proposed activity or activities and all their parts. Note that the “what” is almost always plural. In stating the “what” of the proposed action, focus as specifically as practicable on describing the activities. Connected actions (sec. 05) are included as part of the proposed action. Consider carefully the inclusion of similar actions (sec. 05) which may be included as part of the proposed action. Only those similar actions that are closely related to the proposal and have similar purposes and effects should be included.

The “how” is an integral part of the “what.” If a fuels reduction project is proposed, describe how it will be done: thinning, burning, or both; mechanical means or by hand?

The “where” refers to the geographic location of the project. In stating the “where,” describe the location as specifically as possible. A map is often the best way to illustrate the “where” instead of trying to describe it solely in a narrative format. Several scales of maps might be needed (whole district and project units).

The “when” refers to the timeframe in which the project will be implemented and completed. If a project has several identified phases, the duration of each phase should be documented.

Excerpts from: Forest Service Handbook (FSH) 1909.15 – National Environmental Policy Act handbook; Chapter 10 – Environmental Analysis (06/25/2012)

11.21 - Purpose and Need

The need for action discusses the relationship between the desired condition and the existing condition in order to answer the question, “Why consider taking any action?”

The breadth or narrowness of the need for action has a substantial influence on the scope of the subsequent analysis. A well-defined “need” or “purpose and need” statement narrows the range of alternatives that may need to be considered. For example, a statement like “there is a need for more developed recreation” would lead to a very broad analysis and consideration of many different types of recreation. However, a statement like “there is a need for more developed campsites along Clear Creek” would result in a more focused analysis with consideration of a much narrower range of alternatives.

“Purpose” and “need” may be discussed separately, but normally they are discussed as one because the purpose of an action will be to respond to the stated need.

It is critical that the responsible official and interdisciplinary team members all understand and agree on the need for action. An informed decision can only be made when everyone is working together to solve the same problem.

11.22 - Decision Framework

To fully describe the decision to be made, a decision framework may be identified. This is to ensure the scope is fully described and helps assure the purpose and need, proposed action, and alternatives are relevant to each other. The decision framework may be described in terms of whether or not to implement the action as proposed or an alternative way to achieve the desired outcome. Often a well-described proposed action (who, what, when, where) makes the decision clear. Situations that may need extra clarification include when:

1. Other agencies are involved and have their own decisions or authorizations to make.
2. Laws or previous decisions constrain the decision space.
3. More decisions will be made at a later date.

Remember to include any forest plan amendments that might be part of a decision.

Example of a Need for Change Worksheet

Need for Change Worksheet	
Project/Location: Kaibab National Forest, North Kaibab Ranger District	
{Enter Project Name Here}	
What situation/resource do you want to improve?	
Desired Condition What is the Forest Plan goal or objective for the situation?	
Existing Condition What is today's condition you want to improve?	
Element What part of the situation do you want to focus on?	
Measure What measure will you use to show progress toward Desired Conditions?	
Need for Change? What is the gap between desired and existing values? State the need for resolving the difference.	
Possible Activities What can you do to address your need for change?	
Consistency Check	
Forest Plan Are the activities consistent with the Forest Plan?	
Laws and Regulations Are the activities compliant with other applicable laws and regulations?	
Comment(s): {Enter any additional comments or questions that the IDT resource Specialist has here} Examples: (1) Does anyone have a .jpeg of the file? (2) This is all I can answer at this time without further clarification of the project or a definitive Proposed Action}.	
/s/{electronic Signature of IDT resource specialist}	
{Print/Enter here the Name and Title of the IDT Resource Specialist}	
{Date}	

Heritage: Locate all cultural resource sites in the project area, and protecting them from “adverse effects” from the project. Desired condition is to complete fuels reduction at fire sensitive cultural resource sites during project implementation. Any activities associated with fuels reduction activities would be implemented in such a way as to not generate an “adverse effect” to the sites treated.

- No adverse effects to cultural resource sites from project related activities
- Reduce fuels at fire sensitive cultural resource sites during project implementation

Wildlife:

- Retain habitat elements required by the Mexican Spotted Owl Recovery Plan (2012) for 358 acres of Recovery Habitat within the Burnt Corral project area. These elements include hardwoods, large snags (>18 inches DBH), large downed logs (>18 inches diameter at any point), and large trees (>18 inches).
- Within Northern goshawk post-fledgling family areas (PFA) create grass-forb-shrub interspaces within an uneven-aged forest structure to create foraging habitat and habitat for goshawk prey species as well as various other wildlife including songbirds and deer. Nest areas should be denser than the surrounding PFA with large trees being dominant, but not homogenous, and have interlocking crowns.
- Retain a variety of vegetation types and structures to provide a range of habitats for wildlife species:
 - ✓ Merriam’s turkey roost sites (Ponderosa pine groups) along FS road 427
 - ✓ Gambel oak as a transition habitat for Mule deer and forage for Merriam’s turkey
 - ✓ Interspersed trees ranging from 8-18 inches DBH as quality pine habitat for Kaibab squirrel
 - ✓ Snags around waters for bat roosts

Silviculture (Ponderosa Pine component):

Existing Condition: The current condition of blackjack stands in the Burnt Corral project area is represented by dense patches of stagnant, young ponderosa pine trees in even-aged condition. These types of stands have more than 4 times the number of desired trees, competition-induced mortality (SDI >57% of Max), and highly susceptible to disease. The forest floor is a thick layer of pine needles and duff with very little forage growth and no regeneration of ponderosa pine seedlings. Tree growth is suppressed, and vigor is low; these trees are susceptible to attack from *Dendroctonus* bark beetles, especially Mountain Pine beetle. Wildfire would quickly move into the crown and run through the stand and cause mortality due to absence of openings and canopy gaps. This picture displays the unhealthy condition of a stand that has missed both natural ground fires, and mechanical tree thinning and tending.

Desired Condition: The ponderosa pine forest vegetation community is a mosaic of forest conditions composed of structural stages ranging from young to old trees. The forest is generally uneven-aged and open. Groups of old trees are mixed with groups of younger trees. Occasional areas of even-aged structure are present. Denser tree conditions exist in some locations such as

north-facing slopes, canyons, and drainage bottoms. Desirable ponderosa pine stands include a mix of age and tree sizes, openings available for forage and grass production, space between groups that break up the continuity of the canopy, fire resistance, and young forest to ensure future forest and habitat. The desirable uneven-aged structure of this stand is beneficial for many reasons:

- improved forest health and availability of moisture, nutrients, and light;
- increased production of forage;
- open space and lack of competition for natural and/or artificial regeneration;
- gaps in the canopy so natural surface fire stays on the forest floor;
- enhanced tree vigor and growth conditions to produce large, thick-barked fire-resistant ponderosa pine trees; and
- healthy wildlife habitat capable of supporting a host of animal species.

Need for Change: “Need for Change” as described below:

- The main purpose of Burnt Corral is restoration of the ponderosa pine forest type in the Burnt Corral project area to increase resilience to disturbance, improve forest health, and improve habitat.
- There is a Need to reduce tree density and Stand Density Index (SDI) to the lower range of site occupancy, about 35 – 40% of max SDI in ponderosa pine.
- a Need to meet KNF Forest Plan objectives at the landscape scale for desired basal area ranges in the 50 – 70 sq. ft. per acre range.
- a Need to commercially thin about ~18,000 acres in the project area.
- a Need to pre-commercially thin about ~10,000 acres in the Burnt Corral project area.
- a Need to stimulate oak regeneration in the project area especially in draws, ephemeral streams, and hollers.
- a Need to stimulate aspen regeneration in the project area especially where encountered and at the head of draws, ephemeral streams, and hollers.
- a Need to retain remnant, surviving pine trees in the burned area of the Burnt Corral project area left over after the Bridger Knoll fire (1996 ~ 60,000 acres).
- a Need to protect the plantations in the Burnt Corral project area from the reforestation programs following the Bridger Knoll salvage timber sales.
- a Need to reduce the risk of hazardous, stand-replacing crown fire especially in the central portion of Burnt Corral that has had no timber treatments for the past 25 or more years, and in the entire project area.
- a Need to promote uneven-aged forest where lacking, maintain uneven-aged forest where extant, and create openings in even-aged older stands with patch cuts from one-half to three acres distributed randomly across the landscape.
- a Need to restore fire-prone stands to more open, historic condition and use a leave tree marking guideline; we would remove more than half of the existing cubic foot volume in trees > 5” dbh.
- a Need to establish fuel breaks along major forest roads like 422, 255, and 425 to provide public safety and protection for firefighters if a crown-fire erupted.

Fire & Fuels:

- Return Ponderosa pine forest to a Fire Adaptive Ecosystem (i.e., high frequency – low intensity fires)
- Maintenance Prescribed Burns for secondary treatment (potential managed fire in the future)
- Fuels reduction (lower elevation area has some residual fuels left over from the 1996 Bridger-Knolls fire some 20 years ago.)

Range:

- Increase the presence of grasses, forbs and shrubs
- Reduce the presence of cheat grass, invasives, and noxious weeds

Roads:

- Maintain and/or improve current “public” transportation system
- Roads – estimated that 20% of roads within project area are existing logging roads that are not part of Travel Management System; Utilize roads for project execution, but keep closed to public to protect resources and resource areas in the long run
- Goal to not create any new roads

Other:

- Cheat grass reduction and/or replacement